



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 31 2017

Mr. Richard Corey
Executive Officer
California Air Resources Board
Post Office Box 2815
Sacramento, California 95812

Dear Mr. Corey:

On May 5, 2017, the California Air Resources Board (CARB) submitted a revision to the California State Implementation Plan (SIP) containing the Sacramento Metropolitan 2017 Reasonably Available Control Technology (RACT) SIP Analysis (Sacramento RACT SIP) for the 2008 8-hour Ozone National Ambient Air Quality Standards (NAAQS). The submittal addresses, in part, Clean Air Act (CAA) requirements that ozone nonattainment areas classified as Moderate or above implement RACT for any source covered by a Control Techniques Guidelines (CTG) document and for any major source of volatile organic compounds VOC or nitrogen oxides NO_x for the Sacramento Metropolitan Air Quality Management District (SMAQMD).

We have reviewed the materials submitted with the Sacramento RACT SIP for completeness, and we find that this submittal conforms to the completeness criteria in 40 CFR part 51, appendix V.

On February 3, 2017 (82 FR 9158), the EPA published a finding that certain areas had failed to submit certain required SIP elements for the 2008 ozone NAAQS. The notice indicated that the SMAQMD failed to submit non-CTG VOC RACT for major sources, NO_x RACT for major sources and CTG VOC RACT (for all 44 CTGs). The EPA has reviewed the May 5, 2017 SIP submittal and concludes that this submittal fully addresses the finding of failure to submit with respect to non-CTG VOC RACT for major sources and will therefore stop the sanctions clocks for this required SIP element for the SMAQMD portion of the Sacramento Metro ozone nonattainment area.

The submittal does not fully address the finding of failure to submit with respect to NO_x RACT for major sources and CTG VOC RACT because, based on the conclusions of the Sacramento RACT SIP, RACT rules covering major source NO_x emissions from natural gas fired ovens and the CTG for plastic parts coating operations need to be adopted and submitted to the EPA. Therefore, sanctions clocks will continue to run for the finding of failure to submit with respect to NO_x RACT for major sources and CTG VOC RACT. Those clocks can be stopped after California submits, and the EPA finds complete, the required rules to implement RACT for these source categories.

We look forward to working with you to resolve these remaining requirements. If you have any questions, please call me or have your staff contact Doris Lo, Manager of the Rules Office, at (415) 972-3959, or lo.doris@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Matthew J. Lakin', with a stylized, cursive script.

Matthew J. Lakin
Acting Director, Air Division

cc: Alberto Ayala, Sacramento Metropolitan Air Quality Management District
Kevin J. Williams, Sacramento Metropolitan Air Quality Management District
Kurt Karperos, California Air Resources Board
Jonathan Taylor, California Air Resources Board